

To: Dan Dallas, Rio Grande National Forest Supervisor:

From: Dan Parkinson, Southwest Regional Director for Colorado Backcountry Hunters and Anglers (COBHA). I am submitting these comments as a representative of COBHA and as an individual.

Re: The purpose of this letter is to comment on the Rio Grande National Forest draft revised land management plan of 2017.

This document was submitted December 29, 2017 via email. rgnf_forest_plan@fs.fed.us

Backcountry Hunters & Anglers (BHA) is the sportsmen's voice for our wild public lands, waters and wildlife and we seek to ensure North America's outdoor heritage of hunting and fishing in a natural setting through education and work on behalf of fish, wildlife, and wild places. With over 16,000 members spread out across all 50 states and Canada and more than 1,000 active members in the Colorado Chapter, sportsmen and sportswomen are increasingly looking to BHA as the leading voice on public land management issues. We represent the challenge, solitude, and adventure that only the backcountry can provide. We are working hard to bring an authentic, informed boots-on-the-ground voice at all levels to ensure that our roadless areas and backcountry are protected for the fish and wildlife that thrive there.

I have enjoyed fishing and hunting in several areas on the RGNF over the last 20 years. The RGNF is a wild and mostly undeveloped landscape - a true gem for residents of the state and nation. It is my hope that the Forest Service in this planning process acts to wisely protect the greater resource while managing different stakeholders' interests on the forest.

BHA supports all the recommendations for Wilderness in alternative D. Wilderness preserves large areas of habitat for wide ranging species and provides high quality opportunities for solitude and primitive hunting. We specifically support the recommendations for the Sangre de Cristo, Antora Meadows, Adams Fork addition, Three Forks addition and Saguache Creek Wilderness areas.

In addition, BHA supports the special area recommendations in alternative D, including: Carnero and Jim Creek native fish areas (to help preserve populations of imperiled Rio Grande Cutthroat Trout) and the Spruce Hole-Osier-Toltec connectivity area (to preserve intra-state wildlife connectivity and genetic diversity for elk and other species).

BHA strongly supports the elimination of motorized off road game retrieval proposed in alternative D. This allowance is frequently misunderstood and abused. It results in negative impacts to soils, vegetation, water quality and wildlife. It increases conflicts with other hunters and recreationists, and perpetuates the myth that off-route OHV use has no impact. The current Rio Grande policy permits game retrieval up to 4 miles off designated routes in some areas. This excessively permissive policy is inconsistent with what is permitted on adjacent BLM and other National Forest lands, and should be eliminated.

BHA recommends that management measures be strengthened throughout the plan to incorporate agency standards and guidelines to ensure adequate protection of resources. For example, the FS has used the term "mitigate" instead of "minimize" for bighorn sheep protections. Minimize means taking action to prevent potential negative impacts from occurring in the first place. Mitigate means allow

something that will result in negative impacts to occur, but then try to reduce the negative impacts. For example, when applied to a new proposed trail that would negatively impact wildlife, the term minimize could be used to stop the trail from being constructed altogether, or located in an area so that it avoids significant habitat. Mitigate means the trail would likely be approved/constructed, but then there would be attempts to apply additional restrictions on use (like seasonal closures) to reduce the impacts.

BHA recognizes that seasonal closure dates of travel routes to protect big game winter range as well as migration and birthing areas are an essential part of wildlife management. These closures should be expanded and fully implemented during these critical periods. BHA requests that seasonal closures for winter range be continued until at least April 15 (or as needed with a conditions-based closure).

Seasonal closures should be implemented on routes in elk production areas (from May 15- June 30).

Seasonal closures must be implemented in Bighorn Sheep lambing areas (from April 15-June 30).

Seasonal closures of certain routes should be considered during the spring and fall migratory time period for identified deer and elk migration corridors (until June 1 in the spring and after October 10 in the fall). These align with CPW direction and other Forest Plans.

BHA requests that protections for Bighorn Sheep in the plan must start with listing bighorns as a Species of Conservation Concern (SCC). That bighorn sheep are not listed as a SCC is a major omission of all the plan alternatives. As stated in a letter (attached) sent to Mr. Brian Ferebee, Regional Forester U.S. Forest Service, from a coalition of bighorn sheep advocates dated October 26, 2017, "Bighorn sheep have been designated as a USFS Sensitive Species in Regions 1-5 and portions of Region 6. The facts and science that support Sensitive Species designation have not changed. Those same facts and the best available science reinforce the need to designate bighorn sheep as SCC on many forests. Failure to do so would be contrary to the 2012 Planning Rule and USFS implementation guidance (FSM 1920 and FSH 1909.12)".

Bighorn sheep are listed as a SCC on the adjoining San Juan National Forest and there is inadequate scientific analysis and justification given in the proposed RGNF plan documents for not including bighorns as a SCC. Again, from the letter to Mr. Ferebee "Areas managed by the USFS have historically provided ecological conditions essential to the persistence of native bighorn sheep. However, ongoing presence of domestic sheep on and adjacent to bighorn sheep habitat is a stressor that impairs NFS lands from providing the ecological conditions that bighorn sheep require. Based on strong scientific evidence, we believe there is substantial concern for the persistence of bighorn sheep over the long term. Consistent with stated USFS direction for selection of SCC, bighorn sheep meet the criteria for identifying species of conservation concern (FSH 1909.12 Chapter 10, 12.52c)."

Thank you for the opportunity to comment on the RGNF draft revised land management plan,

Dan Parkinson

- Colorado **BHA** Southwest Regional Director

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October 26, 2017
Mr. Brian Ferebee
Regional Forester U.S. Forest Service
1617 Cole Boulevard, Building 17
Lakewood, CO 80401

Re: Species of Conservation Concern

Dear R2 Regional Forester Ferebee:

The U.S. Forest Service (USFS) and bighorn sheep advocates have a shared interest in providing for persistence of wild sheep on the National Forests. Like elk and other important big game animals, bighorn sheep are integral to the National Forest System. Federal laws and Congressional Acts make conservation of bighorn sheep and their habitat on USFS lands a clear responsibility of the USFS.

We are encouraged by direction in the 2012 USFS planning rule for extensive engagement with the public in development and revision of forest plans (FSH 1909.12, chapter 40, sec. 42), including the evaluation and selection process for Species of Conservation Concern (SCC). We, the undersigned conservationists, seek active engagement in the next steps toward our mutual interest in both the assessment and selection of SCC and development of forest plan components that contribute to bighorn sheep viability on National Forests across the western U.S.

We would like to hold an organizational phone call with appropriate USFS Washington Office and Regional staff to coordinate and collaborate across USFS Regions. This needs to happen to initiate the missing collaboration directed in the 2012 Planning Rule. We also request that you provide us with an up-to-date revision schedule for forest plans that are within historic range of bighorn sheep. We ask those National Forests, either in or soon-to-be in revision, obtain our input and involvement in the planning process as it applies to bighorn sheep. Importantly, this engagement includes developing SCC lists in advance of revision.

Both USFS 2012 Planning Rule direction and repeated Congressional appropriations language require stakeholder inclusion in these discussions. We recognize that responsibility for selection and final approval of SCC rests with each Regional Forester. We also appreciate your recognition of, and personal commitments to, the necessity for collaboration in this process both within and among Regions. We request that Regional Foresters and their staffs: actively engage with bighorn sheep constituents; consistently utilize the best available science across Regions; appropriately evaluate, in some cases re-evaluate, whether or not there is substantial concern over bighorn sheep long-term persistence in the respective planning areas.

We are feeling a sense of urgency as it appears that many National Forests are actively and independently working on SCC evaluation and selection. Information gleaned to date from USFS websites heightens our concern that bighorns are not being adequately considered. Where we have been able to find explicit rationale for not including bighorn sheep as SCC, that rationale appears unfounded and does not appear to be based on the best available science. We feel this erroneously minimizes concern over the security and persistence of bighorn sheep populations.

Bighorn sheep have been designated as a USFS Sensitive Species in Regions 1-5 and portions of Region 6. The facts and science that support Sensitive Species designation have not changed. Those same facts and the best available science reinforce the need to designate bighorn sheep as SCC on many forests. Failure to do so would be contrary to the 2012 Planning Rule and USFS implementation guidance (FSM 1920 and FSH 1909.12).

Historically, bighorn sheep were well-distributed across the western United States (U.S.), numbering up to an estimated 2 million animals. Habitat loss, unregulated market hunting and disease resulted in extirpation of most U.S. populations. Efforts to re-establish populations have been ongoing since the early 1900s, with more than 22,000 bighorn sheep being transplanted in over 1,500 separate transplant actions.

Despite these efforts, die-offs continue. The status of the species remains tenuous, with fewer than 60,000 currently in the western U.S., often occurring in small, isolated herds. It has been well established in the scientific literature that bacteria transmitted from domestic sheep results in pneumonia-related all age die-offs within bighorn populations, followed by long-term suppression of lamb recruitment. These events are not uncommon.

All 14 public-land grazing states with bighorn sheep have experienced at least one bighorn sheep respiratory disease die-off in the last 14 years, and most have had numerous events. According to data compiled by the Western Association of Fish and Wildlife Agencies Wild Sheep Working Group (WAFWA WSWG), a total of 13,391 animals have been lost to these events since 1980. In addition, WAFWA WSWG estimates that as a result of these respiratory disease events, nearly 11,000 lambs born to surviving ewes died of pneumonia within a few months. The initial loss of adult animals is significant. However, it is ongoing depressed lamb recruitment in the years following respiratory disease events that impedes herd recovery and threatens persistence.

Areas managed by the USFS have historically provided ecological conditions essential to the persistence of native bighorn sheep. However, ongoing presence of domestic sheep on and adjacent to bighorn sheep habitat is a stressor that impairs NFS lands from providing the ecological conditions that bighorn sheep require. Based on strong scientific evidence, we believe there is substantial concern for the persistence of bighorn sheep over the long term. Consistent with stated USFS direction for selection of SCC, bighorn sheep meet the criteria for identifying species of conservation concern (FSH 1909.12 Chapter 10, 12.52c).

A timely response addressing our requests will be much appreciated.

Sincerely,

Wild Sheep Foundation
and
WSF Chapters

Alaska WSF
California WSF
Eastern Chapter WSF

National Wildlife Federation
and
NWF Chapters

Arizona Wildlife Federation
Colorado Wildlife Federation
Idaho Wildlife Federation

Backcountry Hunters & Anglers
and
BHA Chapters

Alaska BHA
Alberta BHA
Arizona BHA

Idaho Wild Sheep Foundation
Iowa F for N.A. Wild Sheep
Midwest Chapter WSF

New Mexico WSF
Oregon F. for N.A. Wild Sheep
Utah F. for N.A. Wild Sheep
Washington WSF
Wyoming Wild Sheep Foundation

Montana Wildlife Federation
Nebraska Wildlife Federation
New Mexico Wildlife Federation

North Dakota Wildlife Federation
South Dakota Wildlife Federation
Association of NW Steelheaders
Conservation Northwest

B. Columbia BHA
California BHA
Colorado BHA

Idaho BHA
Montana BHA
Nevada Backcountry BHA
New Mexico BHA
Oregon BHA

Utah BHA

Washington BHA

Wyoming BHA

WSF Affiliates: Desert Bighorn Sheep Society
Anglers Elko Bighorns Unlimited
Fallon Chapter Nevada Bighorns
Unlimited Fraternity of the Desert Bighorn
Nevada Bighorns Unlimited – Midas
Nevada Bighorns Unlimited - Reno
Rocky Mountain Bighorn Society
Bear Trust International
Northern Nevada Chapter Safari Club International